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Marlene H. Dortch
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Federal Communications Commission
445 12th Street, Suite TW-A325
Washington, D.C. 20554

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 7th, 2012

Name of company covered by this certification: MGTCO Holdings, L.L.C.; file number
N/A

Form 499 Filer ID: N/A

Name of Signatory: Gary Menees

Title of Signatory: Executive

I, Gary Menees, certify that I am an officer of the company named above, and acting as agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

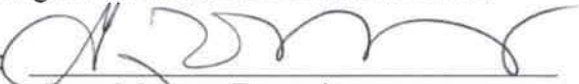
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e. proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

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The company has not received any customer complaints in the past year or at any time concerning the unauthorized release of CPNI.

Signed:



Gary Menees, Executive
MGTCO Holdings, L.L.C.

Attachment

Statement explaining procedures in connection with 2011 Annual CPNI Certification of MGTCO Holdings, L.L.C.

The procedures necessary for the company to protect CPNI are appropriate and in compliance with 47 C.F.R. 64.2009(e). The company makes no use of CPNI for marketing purposes. The company has a switch and billing system which has the ability to track and monitor when changes are made to a customer's address of record and sends immediate notifications of changes to account information. Passwords are issued to all customers at set-up. The initial password is randomly generated and sent to the email address provided by the customer when establishing the account. When changing a password, the customer is not prompted to use biographical or readily available account information. Customers are required to provide passwords prior to any release of CPNI, including call detail information, whether online or in response to a customer-initiated telephone contact. A customer may obtain a lost or forgotten password (1) when the company can authenticate the customer by calling a telephone number of record previously provided for that customer; or (2) when customer requests the password be sent to its email address of record. For online retrieval, users are prompted to provide the username and email address for the account together with security questions that are not based on account specific information or readily available biographical information. In the case of a change of email addresses, notice of the change is sent to the new and old email addresses.

The company has trained its employees regarding CPNI and maintains a policy of ongoing training and compliance and an express disciplinary policy regarding violations of CPNI regulations.